

Appendix 19: East Hanney Parish Council

1. East Hanney Parish Council		
1.1	Representation	We strongly object to Affinity Waters proposals to support Thames water in the development of the mega reservoir at Abingdon. Its provision as currently proposed is not supported by their respective WRMP plans, and if it were to be taken forward would have an everlasting and destructive affect on our village and our residents lives.
	Our Response	We acknowledge your view but believe that our fWRMP19 is robust, meets the requirements and guidance set out by our regulators, meets the long term needs of our supply area and is well supported by our customers. Going forward we are eager to work with you to address your concerns through involvement in our Monitoring Plan.
	Summary of any change to our final WRMP	N/A
1.2	Representation	Affinity Waters obligations for supply and management of water resource is to the area which Affinity serves which is an area north of London, including Bedfordshire. That area has capacity for provision of its own smaller reservoir capable of supporting projected future need for that population. It is able through alternative approached to be able to meet its needs and supply at the point of need.
	Our Response	We have undertaken an options appraisal which follows the industry standard approach as set out in UKWIR (2002) as updated in the Decision-Making Process: Guidance (2016) referred to in the WRMP Guidelines. Our analysis shows that for all four futures, the EBSD modelling selects the SESR option as the clearly preferred option for the first strategic supply scheme. We recognise, however, that there are a number of risks associated with this strategic option and there are uncertainties around the scope, operation and viability of the other strategic options. All of these uncertainties will need to be resolved to a satisfactory extent before our 2023 decision point. Our analysis shows that for all four futures, the EBSD modelling selects the SESR option as the clearly preferred option for the first strategic supply scheme. We recognise, however, that there are a number of risks associated with this strategic option and there are uncertainties around the scope, operation and viability of the other strategic options. All of these uncertainties will need to be resolved to a satisfactory extent before our 2023 decision point.
	Summary of any change to our final WRMP	N/A
1.3	Representation	There is no justification for Affinity to be seeking to participate in the procurement of a mega reservoir in an area which is geographically outside of its obligations and duties as a statutory under taker (Affinity has no statutory undertaker obligations here!) And therefore, no contractual duty to engage in reservoir development in this area.
	Our Response	See response to 1.2
	Summary of any change to our final WRMP	N/A
1.4	Representation	The needs for a reservoir, or for a reservoir of this size are not justified.

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		<p>If reviewed independent of Affinity, Thames Water obligations for the period of the plan can be met by resolution of leaks and alternative source of supply as noted within the options set out in their plan and as identified by lobbying bodies who have scrutinised the need and delivery requirements of TW. For example, by the Severn water transfer plan, which is just one of many ways which Thames Water could deliver its requirements.</p> <p>Consequently, it is clear that Thames water have only involved Affinity in their plan as a joint partner in order to try and build a case for a level of demand in order to facilitate generation of assets. As demand can be met by alternative approaches, it would seem that the proposal for a mega reservoir is a capital finance play by Thames water and Affinity, and is not driven by a bonafide demand essential to meet consumer needs. Both Affinity and Thames water separately having the ability to meet their obligations and both also having leakage issues which should be addressed as a priority.</p>
	Our Response	<p><i>Enabling actions for future strategic supply options</i></p> <p>Significant coordination has been undertaken between ourselves and other water companies when producing our respective WRMPs. This included coordination between the companies on approaches to adaptive planning, checking volumes of existing and proposed transfers and shared options to address deficits in supply-demand balance.</p> <p>As part of both the Business Plan and WRMP updates we have directly coordinated with Thames, Anglian, Southern, United Utilities and Severn Trent Water to ensure our proposals for AMP7 (2020 to 2025) strategic scheme investigations are fully aligned. The dates presented for our adaptive strategy and monitoring plan reflect that process. As the SESR is identified as the preferred option through the ‘best value’ analysis carried out for this WRMP, we have specifically referred to Thames Water’s adaptive plan in our WRMP, and highlighted the alignment in investigations, development and adaptation between our two plans.</p> <p>The enabling actions that we identify for AMP7 in our fWRMP have been developed for the strategic schemes in alignment with the Business Plan process, and in particular our response to Ofwat’s Initial Assessment of Plans (IAP), which requires such investigations as part of our AMP7 Business Plan.</p> <p>A core part of this process relates to the setting up of a ‘gated’ process, whereby the strategic scheme investigations are carried out jointly by the water companies involved, and the scope of works and decision whether or not to proceed to the next gate is scrutinised by the economic (Ofwat) and environmental (EA) regulators. This gated process will apply to all of the strategic investigations, and covers the enabling actions associated with the SESR, the River Thames to Affinity Transfer, the GUC transfer and the South Lincolnshire reservoir scheme. Our enabling actions are summarised in the Table below.</p>
	Summary of any change to our final WRMP	Updated Chapter 6 in fWRMP19.
1.5	Representation	<p>The proposal for a mega reservoir at Abingdon is potentially a strategic distraction for the purpose of the respective wrmp plans, as it has the potential to distract away from the real obligations which both Affinity and TW have independently as statutory undertaker to their catchment areas, which is to address the leakage.</p> <p>If the reservoir were to come forward this would mean that the companies would not focus on leaks and thus the reservoir proposal should be refused, as otherwise Affinity and Thames would not have commercial incentive to fix the leaks, which should be their priority.</p>
	Our Response	We fully support the ambitions to substantially reduce leakage by 2050. Our initial aim is to achieve a 50% reduction in leakage between 2015 to 2045. This 30-year programme to reduce leakage by 50% is planned to deliver five years earlier than most other water companies because we started the process in 2015, and will already have delivered a 14% reduction by 2020, followed by a further 18.5% reduction between 2020 and 2025. We will then aspire to achieve a higher level of

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		<p>reduction, to 57% from the 2015 position, which will allow us to reduce leakage by 50% from our 2020 position.</p> <p>Clarification of the 50% target and the ambition for 50% post AMP7 (i.e. 57% overall) is included in the fWRMP19 along with clarification of how we have handled mains renewals for leakage and trunk mains schemes. Explanation of how we will achieve leakage efficiencies and details of our leakage reduction strategy are provided in Technical Report 4.8: Leakage Strategy Report and referenced in the fWRMP19.</p>
	Summary of any change to our final WRMP	Updated Technical Report 4.8: Leakage Strategy Report and referenced in the fWRMP19.
1.6	Representation	<p>The Thames water plan is also only based on projections to 2050 which they themselves acknowledge are only projections. They have confirmed in responses to their consultation that it is true that the projections are only projections! The business case is therefore admitted by Thames as not being certain. The same factors which make the Thames water projections uncertain, and unprovable, also impact on the projection of needs for Affinity.</p> <p>Such projections being based on cumulative population growth, without detailed adjustments for realistic population saturation, housing growth slow down, growth outside of the area (such as that which is already being put into play by initiatives such as the Oxford to Cambridge highway, HS2, and housing development programmes in the central regions). In addition, there are also demographic changes brought about by technology removing the need for south England location, the impact of Brexit, and the effect that the changes in immigration policy will bring about reducing net immigration, and therefore water demand requirements in Affinity's and TW's catchment areas.</p> <p>It is against this background that some very serious questions arise, and flaws seen in Affinity's argument for water supply from this area (Abingdon), which makes their case to be clearly unfounded.</p>
	Our Response	<p>We have followed required best practice and planned for growth as per Local Authority plans. Where we have made adjustments due to differences in baseline population and properties and the management of blocks of flats in the forecast, we have clarified this in our plan and technical reports.</p> <p>We recognise that high growth is only within the draft GLA plan, so this is not included in the forecast of baseline demand. Our fWRMP addresses GLA growth through inclusion of a "high-growth" scenario in our sensitivity testing. In the event of a "high-growth" scenario being realised we will rely on some of the less environmentally-damaging drought permits and will accelerate delivery of our first supply option to 2032. We would need a second strategic option by 2042 and a third strategic option within the 2080 time horizon.</p> <p>Additional growth from the CaMkOx development corridor has not been explicitly included as no planning figures are available at the moment but we will continue to review our forecasts as new information becomes available as reflected in our adaptive plan.</p>
	Summary of any change to our final WRMP	Our fWRMP19 addresses GLA growth through inclusion of a "high-growth" scenario in our sensitivity testing.
1.7	Representation	<p>It is claimed that the need for a reservoir at Abingdon is urgent, the urgency arising because of early demand needs of Affinity. As a consequence, it is being argued that the work on the reservoir at Abingdon needs to be brought forward to 2025. There is no supporting evidence in the plan provided by Affinity for this, they have sufficient supply to well beyond this period. There also being issues with the projections provided as outlined above. This is a fundamental point, there is no requirement for Affinity to require a supply from Abingdon either in the short or long term period of the plan. This is because:</p> <p>a) the demand is not substantiated, particularly for the short term, and b) there being other alternatives open to Affinity including (if they needed) developing a smaller reservoir in their own area, (should it be required in the longer term).</p>

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	Our Response	The timing of our first strategic option has been carefully considered and determined according to our decision making methodology. The results of that modelling are provided in section 7.2.4 of the main SoR document.
	Summary of any change to our final WRMP	N/A
1.8	Representation	The Group Against Reservoir Development (GARD) have found that Affinity Water has not proven the need for the Abingdon Reservoir during the period of their plan, and therefore not before at least 2060, and could from a future date base a reservoir elsewhere. As there is no case in their plan for a reservoir before 2060 there is no need or justification for early construction of a reservoir. Consequently, Affinity should not be supporting Thames waters plans to bring the reservoir forward, or indeed be supporting the need for a reservoir of this size at all!
	Our Response	See response to 1.7 above.
	Summary of any change to our final WRMP	N/A
1.9	Representation	In both Affinity and Thames water plans there is no absolute evidence of a requirement for a mega reservoir, as noted above the case looks to projections which they admit are not certain, and underlined by a capital finance play. We are concerned that the financing and asset base gain to the companies may be the true driver of the proposal, rather than the strategic need of the populations which these water companies are supposed to be serving. Otherwise more reasonable and less environmentally intrusive alternatives to provide for the future would be preferred in their plans (for example, smaller reservoirs, and desalination schemes).
	Our Response	We have continued to provide additional cost transparency where it is possible to do so in Technical Report 4.4 LRMC cost model update, and have agreed the approach to the representation of financing and repayment costs for large capital schemes in Table 5 of the WRMP. We have updated the costs included in our fWRMP in response to better information becoming available between publication of our rdWRMP and our fWRMP.
	Summary of any change to our final WRMP	Updated Technical Report 4.4 LRMC cost model.
1.10	Representation	Affinity have amongst other options the following means of providing supply independent of the proposal led by Thames water for the mega reservoir: a) They should repair more leaks. As set out above, the reservoir proposal is a distraction from this core obligation as a statutory undertaker. If they cannot prioritise and repair the leaks in their area and for which they are responsible, they should stand down as the statutory undertaker! b) Currently they are refusing to meet Ofwats target of 50% reduction by 2050, only offering 40%. At a minimum reduction should meet or exceed Ofwats targets. They should be required to meet the minimum requirement, and this would remove the need for the reservoir of the size proposed. c) They could fully utilise water from their existing connection to Anglians Grafham reservoir. d) They could install more smart meters. It is understood that they plan to continue to install dumb water meters, yet these do not reduce useage as proven by smart meters. Other companies have consequently moved to smart meters, and Affinity should do the same (Smart meters reduce consumption by 10%).
	Our Response	We fully support the ambitions to substantially reduce leakage by 2050. Our initial aim is to achieve a 50% reduction in leakage between 2015 to 2045. This 30-year programme to reduce leakage by 50% is planned to deliver five years earlier than most other water companies because we started the process in 2015, and will already have delivered a 14% reduction by 2020, followed by a further 18.5%

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		<p>reduction between 2020 and 2025. We will then aspire to achieve a higher level of reduction, to 57% from the 2015 position, which will allow us to reduce leakage by 50% from our 2020 position.</p> <p>Clarification of the 50% target and the ambition for 50% post AMP7 (i.e. 57% overall) is included in the fWRMP19 along with clarification of how we have handled mains renewals for leakage and trunk mains schemes. Explanation of how we will achieve leakage efficiencies and details of our leakage reduction strategy are provided in Technical Report 4.8: Leakage Strategy Report and referenced in the fWRMP19.</p>
	Summary of any change to our final WRMP	Technical Report 4.8: Leakage Strategy Report and referenced in the fWRMP19.
1.11	Representation	<p>We must also highlight that neither Thames Water or Affinity have undertaken any consultation locally in our village East Hanney. As the proposed reservoir is proposed to be sited in our village this is incredulous!</p> <p>In response to this point Thames water in their consultation response advised that the consultation would follow later. That is not acceptable and gives a very sound basis for challenging the choice of site.</p> <p>The choice of site is supposed to have been determined through an assessment of potential alternatives. The analysis and basis of determination is unclear, and in conversations with Thames water they advised that they had dismissed some alternative sites because of matters such as loss of woodland. However, there has been no consultation at East Hanney to understand the local issues of this area, and the consequences of the impact of such a mega reservoir on the community, and on the village, as well as on the local infrastructure. It is also the case that Thames water were not aware of housing permission being granted immediate to the site in East Hanney, although they have now noted this. This means that the process for determination of a) the location of the reservoir, and b) its size is unsound. This is because the assessment has not considered the impact on the communities, the local environment, consequences on changes in infrastructure, local risk issues, and population concerns. As there has been no consultation, due consideration of each of these matters has not been built into the strategic assessment of the choice and size of site, and therefore the choice of Affinities and Thames waters preferred location, and proposal for a mega reservoir, is unsound and open to challenge.</p>
	Our Response	<p>Detailed assessment of the location, size, impacts and mitigation measures will be addressed as part of the Development Consent Order (DCO) application process, if the scheme progresses to that stage. Schemes are not analysed to that level of detail at this strategic stage of the process.</p> <p>A detailed response to the consultation issue is provided at 1.19.</p>
	Summary of any change to our final WRMP	N/A
1.12	Representation	<p>We also have the following comments relative to the risks and consequences of the reservoir, which Affinity have not or do not seem to have recognised.</p> <p>A smaller reservoir would not present the level risk when compared to that which is proposed, especially if it was to be centred on the same point as the proposed mega-reservoir and would thus sit away from the land areas where the reservoir is currently proposed, leaving a large proportion of the network of natural waterways and flood protection systems in place.</p> <p>East Hanney Parish Council (EHPC) is concerned not only about flood risk, but also the wider consequences on the village, and the everlasting impact and change that it will bring. Thames water (TW) claim that it will bring benefits to the local area, but when questioned this is supposedly relating to local employment opportunities. In reality any employment will be through major contractors utilising workforces from outside the local area, importing workers, or corporate teams due to the size and scale of the contracting works. There is no benefit for the community and EHPC finds this and other statements</p>

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		<p>made by TW misleading and false. TW has listed a number of statements to support their proposal that are untrue and must be withdrawn, more examples are identified below.</p> <p>EHPC is very concerned about the proposed extent of the works and the risk of contamination to the area and existing under- and over-ground water systems.</p> <p>EHPC does not believe that there is demand or a need for a reservoir of this size and that TW and Affinity are 'being creative' in their business case for the need, instead they should be realistic and be looking to provide a solution in their plan which meets actual need and is not based on their failure to address the significant problems such as systemic leakage.</p> <p>It is noted that Thames water jointly with Affinity would be seeking to achieve a profit from the sale of water from the reservoir to their consumers and potentially to third parties.</p> <p>In order to consider the proposal EHPC engaged an independent firm of expert hydrologists who have in their team specialist reservoir development engineers, Water Resource Associates llp (WRA).</p> <p>EHPC has also met with representatives of TW and thank them for the information that they provided.</p> <p>The WRMP as currently proposed is flawed and thus unsound. EHPC does not think that it is substantiated and it is clear that TW and Affinity have not put in sufficient work to evidence the need or requirement of this project. Much of what is provided in the consultation is based on historic data, much from over a decade ago, which is therefore out-dated and not reliable. Very worryingly it does not include any consideration of, or impact on the local community and the immediate area. As noted above it is appalling that TW and Affinity have not even undertaken a review of the impact on the community, settlement and lowland vale landscape that this will destroy.</p> <p>It is essential that the plan is referred to the Secretary of State and is subject to a Public Enquiry. Thames Water and Affinity should be made to reassess the need and delivery options. The plan needs to be subject of a public enquiry because it is not robust, it is unsound, and is driven by strategic delivery objectives which do not reflect the interests of the area for which they are appointed as the utility provider. It would seem that this is very much proposed for capital and financial benefit.</p>
	Our Response	See response to 1.21 below.
	Summary of any change to our final WRMP	N/A
1.13	Representation	<p>Need for a reservoir?</p> <p>The case for a reservoir of this size as outlined by Thames water seems to be based on a combination of just 3 factors: These are:</p> <p>1) The projected population growth for the period to 2100 that assumes an increase of 4.1m people in the catchment area, with a 2.1m increase by 2045. This shows a jump in their figures, nearly doubling between the periods to 2015 and 2100.</p> <p>In our discussions TW admitted that they were simply using published statistical projections and that these were likely to change, particularly the increase to 2100. As this represents a near doubling, when compared to capacity for population absorption the demographics would not and could not reach this point in this period. The projections to 2045 are similarly unlikely and dependent on change.</p> <p>As noted above, it should be considered that the demand from the population in the TW area and in Affinities area will be much smaller than that projected and as a consequence either the reservoir is not needed, or a much smaller reservoir only which could be located in a number of places, might be required. A mega-reservoir that carries the risks and disadvantages that the current proposal suggests is not required.</p> <p>To reiterate the reasons why the population projections are likely to change include:</p>

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		<ul style="list-style-type: none"> The as yet unknown outcomes of 'Brexit' and changes to national immigration policy, Saturation of urban and suburban areas leading to a change in development patterns into what are currently less dense communities (which due to space and current government planning strategy will be outside of the Thames and Affinity water areas), and thus result in a levelling off in demand in the Affinity and Thames Water catchments before the additional supply that is suggested is needed, is required. We are already seeing this with Central and Local Government housing policy leading to more population movements to outside of the area, for example to the West and East Midlands and the North West. The development of new main transport links would provide ease of movement from the south. These include the proposed Oxford to Cambridge 'expressway', and the HS2 rail line, which will ultimately enable population to live outside the region. <p>Thus the projections are certain to change. The proposal looks like an attempt to gain support for a major infrastructure project that will generate a long-term revenue flow rather than a plan aligned to the need in the area for which Affinity and TW are separately responsible.</p>
	Our Response	<p>We do not accept that population growth has been overestimated. In this regard we have followed best practice and guidance in planning for growth as per local authority plans. As for the draft GLA plan, we recognise that this draft local plan predicts particularly high growth. As a result, it is not included in the core adaptive pathways element of our decision-making process, so the EA has raised concerns that our growth forecasts are too low. However, this has been addressed through additional modelling and increased flexibility in the adaptive plan for the fWRMP19. Additional growth from the CaMkOx development corridor has not been explicitly included as no planning figures are available at the moment but we will continue to review our forecasts as new information becomes available as reflected in our adaptive plan.</p> <p>Based on the above, overall, we consider that we have taken a balanced approach to growth forecasts.</p>
	Summary of any change to our final WRMP	N/A
1.14	Representation	<p>2) Failure to address leakage and deliver a sustainable leakage prevention solution. It is a well-publicised fact that both Affinity and TW are losing as much water from leakage as the proposal for the mega-reservoir would provide. As set out above whilst Affinity are proposing to address leakage, this is at a level below the minimum requirement. Similarly, TW are still not addressing the issue sufficiently and as the provider and manager of water resources across and for the Thames Valley should have their focus on reducing leaks.</p> <p>It is also the case that the cost of such a reservoir will be to the account of customers. There is no case for them to substantiate the risk, cost, or need for such a dramatically high level of capital investment when there is no local need. Reduction of leaks is surely the priority.</p>
	Our Response	See leakage response at 1.10.
	Summary of any change to our final WRMP	
1.15	Representation	<p>3) Thames Water's desire to provide water supply to third parties. This EHPC suggests is the real reason why TW are proposing this mega-reservoir. The contract with Affinity Water and other parties outside of the TW supply area is a commercial matter and thus outside their core requirement to provide and manage resource in their own region.</p>

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		<p>It is not therefore within their core responsibilities and thus cannot be considered as a justifiable reason for the additional need for storage and capital investment on such a scale. This is about profit, and should not be allowed as it is at environmental and financial cost to the customers whom TW are appointed to serve. By supporting it Affinity are implicit in profit generation and focus on capital and asset development rather than on supply and needs delivery, especially as the needs can be met by other more straightforward and environmentally sustainable alternatives.</p> <p>The supply of water needs should be aligned to proven local need in the area, and Affinity must be incentivised to fix the leaks across its region. The proposal for the mega-reservoir is a distraction for them; it is a major capital project that would divert managerial and technical resource away from the real issue that is to address the current failures. It should not therefore be taken forward.</p>
	Our Response	<p>The development of the reservoir will be carried out to provide water to customers in line with the statutory duty of both Thames and Affinity Water to provide supplies. It should be noted that, at this stage, the proposal is that investigation and promotion will be carried out jointly by Affinity and Thames Water, with joint funding through the regulatory price control process. The exact commercial arrangements on any development have not been finalised, and it may be that construction and development would be carried out by a third party in line with the economic regulator's (Ofwat) rules on direct procurement. Any suggestion that Thames Water is seeking to promote the reservoir to make profit through a 'buyer-seller' type arrangement is not reflective of the regulatory proposals contained in our WRMPs or Business Plans</p>
	Summary of any change to our final WRMP	N/A
1.16	Representation	<p>Value for Money</p> <p>Supply must be provided on an efficient and value for money basis. To do this the resource would need to be developed in line with real need over time. There is no sound evidence that the actual need is likely to require a mega-reservoir. Instead it would seem more appropriate that if there is deemed to be a shortfall, that this be served by one of the other options tabled, or a smaller reservoir, which does not carry the costs, and risk, which the reservoir as currently proposed, would bring. A smaller reservoir would therefore represent much better value for money, being aligned to need over time, with capital costs related to time and use. So that therefore if in 2080 a second reservoir is deemed to be needed, it can be provided closer to and at a cost to the customers who are to use it at that point. TW should not be proposing and Affinity should not be supporting a scheme which is currently not required and which would be at cost to the current users who are already suffering as a result of the costs of leakage.</p>
	Our Response	<p><i>Enabling actions for future strategic supply options</i></p> <p>Significant coordination has been undertaken between ourselves and other water companies when producing our respective WRMPs. This included coordination between the companies on approaches to adaptive planning, checking volumes of existing and proposed transfers and shared options to address deficits in supply-demand balance.</p> <p>As part of both the Business Plan and WRMP updates we have directly coordinated with Thames, Anglian, Southern, United Utilities and Severn Trent Water to ensure our proposals for AMP7 (2020 to 2025) strategic scheme investigations are fully aligned. The dates presented for our adaptive strategy and monitoring plan reflect that process. As the SESR is identified as the preferred option through the 'best value' analysis carried out for this WRMP, we have specifically referred to Thames Water's adaptive plan in our WRMP, and highlighted the alignment in investigations, development and adaptation between our two plans.</p> <p>The enabling actions that we identify for AMP7 in our fWRMP have been developed for the strategic schemes in alignment with the Business Plan process, and in particular our response to Ofwat's Initial Assessment of Plans (IAP), which requires such investigations as part of our AMP7 Business Plan.</p> <p>A core part of this process relates to the setting up of a 'gated' process, whereby the strategic scheme investigations are carried out jointly by the water companies</p>

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		<p>involved, and the scope of works and decision whether or not to proceed to the next gate is scrutinised by the economic (Ofwat) and environmental (EA) regulators. This gated process will apply to all of the strategic investigations, and covers the enabling actions associated with the SESR, the River Thames to Affinity Transfer, the GUC transfer and the South Lincolnshire reservoir scheme.</p> <p>Monitoring Plan</p> <p>We have also incorporated further clarity and detail on the AMP7 Monitoring Plan in Chapter 6 of our fWRMP19. As well as the metrics that will be monitored, we have included proposals for stakeholder engagement and information sharing, based around four key 'themes':</p> <ul style="list-style-type: none"> • Theme 1: Small scheme investigations – this will involve working with the EA, Natural England (NE) and the Canal & River Trust to confirm the viability of smaller schemes such as the Brent Reservoir and the Lower Greensand schemes. • Theme 2: Reductions in Abstraction - we propose to re-start the Chalk Rivers Partnership that was trialled in AMP6 and incorporate Catchment Partnerships into our review process, with a view to determining the probable level of future sustainability reductions in time for the 2023 decision point. • Theme 3: Managing Growth and Demand - we propose to form a Partnership for Managing Growth and Demand, who we will consult with on updates to growth forecasts and the data and findings from our demand management and leakage programmes. We will also consult on a regular basis with Thames Water, to share progress on demand management and considerations of delivery risk. • Theme 4: Strategic Option Investigations - this will primarily be managed through the gated development process described above; the individual schemes will require stakeholder engagement plans to be developed as part of the investigations.
	Summary of any change to our final WRMP	N/A
1.17	Representation	<p>Issues with the business case</p> <p>Other than the fundamental aspects, including those set out above regarding lack of substantiation, and failure to align supply with true identified need. It is at a substantial cost to current rates payers, who will not benefit from the water held in the mega-reservoir. It is also a cost to the public purse, poor value for money, and brings risk and deliverability issues There are also some very basic aspects of the case put forward by TW and Affinity which is flawed. These include:</p> <ul style="list-style-type: none"> • Much of their data and arguments for the business case are based on information relating to 2007. For it to have been provided in 2007, such content would have been originated prior to that date. Fundamentally, a lot of the considerations and arguments for the reservoir are outdated and no longer applicable. The case is not therefore robust and is unsound. • The diagrams provided are illustrative only and are not therefore what the reservoir may look like, or from where it will be served. Specifically what area the mega-reservoir might cover. This has serious consequence for the village and parish of East Hanney as it would be considerably more invasive than suggested, being close to currently planned housing development. Also, the area currently proposed has a number of problems associated with it that TW/Affinity have failed

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		<p>to recognise, such as areas of flood risk, and consequence of the loss of drainage system to the surrounding fields and agriculture.</p> <ul style="list-style-type: none"> • Errors and omissions, in the statements provided or omitted. For example, with regard to the selection of the site at Abingdon for a single reservoir, (it is in East Hanney/Steventon not Abingdon), amongst the factors that are given for the case, are the following facts: - Easy rail access, with link to the possibility of a new rail station at Grove. This is not a firm plan, a situation that has changed since 2007 and is not likely to be developed before the middle of the century. • The line is now electrified, This causes two issues: for rail to be used to supply the site there would now need to be installation of a electrified spur line to the site off the main London to Swansea route; access to the line is restricted with the electrification pylons so plant could not be removed from static trains even without a station. In discussion TW representatives, admitted that the intended benefit of avoiding heavy construction traffic was now not possible. We cannot see that this is clear in the proposal, yet this was an important consideration in the selection of the site. • Since 2007 the village of East Hanney has been subject to 3 severe floods, including flooding arising from the Ock not being able to release its water into the Thames at Abingdon. TW have made statements regarding historic environmental factors, and claim that there is no risk of flooding. This would seem to be false and not supported with updated data. There is no recognition of the flood risk here, and this is very unsound. • A new housing estate has been built on the edge of East Hanney and also in Steventon immediately adjacent to the proposed mega-reservoir, with further homes still to be built. This will affect the positioning and land available to develop the project. <p>There are many more similar examples, but EHPC trusts that this evidences that the proposal is not substantiated and therefore not credible.</p>
	Our Response	See response to 1.21 below.
	Summary of any change to our final WRMP	N/A
1.18	Representation	<p>Site selection – options analysis</p> <p>As noted above the site selection process is unsound. TW stated that they considered 55 sites, how many have they discarded because of flooding or lack of access by rail? They have certainly discarded sites based on environmental factors such as protection of woodlands.</p> <p>The adverse impacts on the proposed mega-reservoir at East Hanney have not been considered, this is absolutely the case as there has not yet been any detailed local consultation or consideration of Planning Inspector statements that relate to this area, for example the statements made in paragraphs 9-16 and 38 of the Inspectors decision regarding development close to the village in appeal reference APP/V3120/W/16/3142562.</p> <p>Furthermore, there has not been any work recently undertaken or report provided on the impact of the reservoir on East Hanney and the surrounding environment.</p> <p>The changes to our landscape and the consequence of the works and the impact of the imposition of a 25 meter high reservoir above ground on the village and wider</p>

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		<p>environment needs to be taken into consideration and understood before any of the other 54 sites are dismissed.</p> <p>It is clear that the work undertaken to date has been very high level and would appear to have been 'managed' to arrive at the East Hanney site as providing the best solution that does not prioritise the fixing of leaks! Also that TW has given focus to the sale of water to third parties under a commercial relationship with Affinity, rather than on meeting local need and addressing local concerns. We substantiate this statement by the evidence of lack of assessment on the local area, community, and environment.</p>
	Our Response	See response to 1.21 below.
	Summary of any change to our final WRMP	N/A
1.19	Representation	<p>Consultation</p> <p>As stated above, there has not been any local consultation with the village, neither TW or Affinity have undertaken any analysis of the impact that the reservoir would have on the local area, both technically, and socially. Therefore, it is not known if it will be sound, and there is no detail on the consequences of the weight of water on the underlying geology or on the agricultural land affected, which will lose water from the loss of the existing drainage channels.</p> <p>For the local communities of East and West Hanney, Grove, Steventon, Drayton and Marcham this is very concerning. It is worrying that whilst consultation has been running at events in the centre of London; there has not been any direct consultation in our village by TW or Affinity. People work and are not able to attend events in London, these have been deliberately time-tabled at a location and at times so inconvenient that local people have not been able to attend, or understand in full the consequences of what TW with the support of Affinity are proposing.</p> <p>The lack of local consultation in the village appears deliberate and intended to keep this under the radar. It means that a lot of households are not aware and have not been informed and therefore not known, so have not voiced their opinion. TW and Affinity may say that they have held some pop up consultation sessions, but again these were not advertised appropriately, and have not been held in East Hanney.</p> <p>TW/Affinity have not undertaken a resident leaflet drop around the village or invited residents to submit comments. TW with Affinity should be made to jointly undertake a comprehensive local consultation exercise before their proposals are considered further.</p>
	Our Response	<p>As residents in the Oxfordshire area are not our customers we did not engage with them directly.</p> <p>We met with Oxfordshire County Council and the Vale of the White Horse District Council and the Group Against Reservoir Development (GARD), on two occasions, to hear and discuss their concerns directly.</p> <p>The further consultation was open to all stakeholders and we received written representations from the following:</p> <ul style="list-style-type: none"> • Oxfordshire County Council • Vale of the White Horse District Council • GARD. • Ardington and Lockinge Parish Council • East Hanney Parish Council • Garford Parish Meeting • Green Corridor Group • Group Against Reservoir Development (GARD) • 125 Individuals from the Oxfordshire area • Steventon Parish Council • Wantage and Grove Campaign Group • West Hanney Parish Council <p>Our further consultation online survey received 43 responses from the Oxfordshire area.</p>

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		<p>Representatives from GARD and East Hendred Parish Council attended our Stakeholder Assembly.</p> <p>All the above representations and responses have been considered in the development of our final Plan and addressed in our Statement of Response.</p>
	Summary of any change to our final WRMP	N/A
1.20	Representation	<p>Risk of flood EHPC has engaged a reputable independent firm Hydrologists who include specialists in the development of flood prevention and reservoir construction.</p> <p>TW are clear in their published papers and fliers to the public that there is no increased risk of flood. This is misrepresentation and a misleading statement that must be immediately withdrawn.</p> <p>In the first instance their proposals are based on an illustrative or artists impression of the outcome. Therefore the mega-reservoir as proposed is very likely to change in shape, and design, including in landscaping and design.</p> <p>Based on the current outline description, the mega-reservoir will be positioned directly across the main floodwater flow from the direction of East Hanney to the Ock. Although watercourses are to be built to direct the water around the reservoir, in times of flood this will backflow into the Letcombe Brook at East Hanney.</p> <p>The risk of flood is highly dependent on the ground heights arising from the reconstructed landscape. Special attention needs to be given to this to avoid risk of certain flood. Please see diagram below that illustrates the floodwater flows.</p> <p>In addition there is certainty of flood onto the Steventon road at East Hanney. This has been identified by WRA who state:</p> <p>“The reservoir location will cover an area of low-lying ground between the villages of East Hanney to the west, Steventon to the east Marcham to the north and the main Didcot to Swindon railway to the south as shown in Figure 1. The total area of the development including the embankment will be 8.59 km², and the development will occupy part of the catchment draining to the River Ock. The topography of the area in the form of a digital terrain model (DTM) has been generated from 2m LiDAR data available from the Environment Agency. The overall slope of the land for the reservoir development is in a south-west to north-east direction with the altitude ranging from over around 63m AOD (metres above ordnance datum) in the south-west to 54m AOD in the north-east. None of the area of the reservoir development currently drains towards East Hanney. The village is mostly within the catchment area of the Letcombe Brook, with some areas of new development draining into stream which flow to the Childrey Brook between the A338 and the reservoir boundary.</p> <p>“The development area is characterised by shallow superficial deposits of sand and gravel over impermeable clay which provide flow through groundwater to a dense network of ditches which convey the flow into the main channel of the River Ock about 500m to the north. Construction of the reservoir will require the bed and the embankment to be sealed with impermeable material to prevent leakage, therefore there will be no infiltration of rainfall to the shallow groundwater. Overall therefore a slight reduction of flows to the River Ock would be expected. An area of 6.46 km² will be removed from the 230 km² River Ock catchment at Abingdon. This is the area of the reservoir development inside the crest of the embankment. The new embankment of the reservoir, rising some 15-25m above the existing ground levels will divert some surface runoff from the development area into the drainage network. The reservoir proposals show that this would be conveyed from the southern side into two new waterways flowing to the east and west at the foot of the embankment [...], which is taken directly from the Thames Water report.</p> <p>“The channel to the west flows around the south-west corner of the reservoir then into the areas between the western extent of the reservoir and the A338, some 600m from the eastern edge of East Hanney. In addition to surface runoff from the embankment this new</p>

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		<p>channel will take drainage from streams flowing north from the foot of the Berkshire Downs. The impact on flood risk would be notable as a large area of flood storage depicted by flood zone 3 (the 100-year flood extent) will be removed following the construction of the reservoir. This storage will need to be incorporated within the course of the new channel and this will encroach towards the eastern edge of East Hanney. The current ground levels at this part of East Hanney are around 60.7m AOD, whereas the edge of the reservoir embankment to the east has ground levels of 59.3m AOD. As long as these overall levels are maintained then the flow of water would be away from East Hanney. Although the streams will obviously no longer receive the rainfall falling on the reservoir area, the majority of the flow will be groundwater fed issuing from the Chalk aquifer of the Berkshire Downs to the south.</p> <p>"In addition, the channel also needs to cross under the Steventon Road, between the edge of the embankment and the village of East Hanney, a proper culvert design needs to be included which would provide conveyance for the 100-year flood plus an allowance for climate change. The potential flooding of the Steventon Road would be a significant impact on the residents of East Hanney as it is the main route to the east. It is expected that Thames Water or their consultants would prepare a flood risk assessment to consider the diversion of waterways and flood storage."</p>
	Our Response	A number of comprehensive flood risk studies regarding the SESR are available. A review of flooding and the provisions made to mitigate effects on flood risk due to the SESR has been undertaken, available in Thames Water's Statement of Response No.2 Technical Appendix K. We have reviewed this and concur with the recommendations for further work, and also note that a Flood Risk Assessment for the SESR will be required to support the Development Consent Order (DCO).
	Summary of any change to our final WRMP	N/A
1.21	Representation	<p>Local concerns Residents have voiced concerns amongst other matters about:</p> <ul style="list-style-type: none"> • There is not adequate floodplain identified to compensate for the proposed reservoir. • Flood risk will be increased to surrounding villages. • The visual impact will be greatly detrimental to the area, the enormous size of the structure is quite frightening, the muddy inner embankments when the proposed reservoir is not full will look ugly, the many extra ancillary structures on the site and the very, very steep 80 feet high embankments surrounding the proposed reservoir. All of these are not acceptable in this location. • These very high embankments have not been tested because new construction methods are to be used due to this being the largest reservoir ever attempted. If these embankments fail for any reason 150 million cubic metres of water will flood everything and everyone in its path. • The effect of the weight of the reservoir plus the water on the land is unknown and could be devastating to the surrounding villages. • During construction the surrounding watercourses will be substantially disturbed and polluted and may never recover. • The noise and vibration during the 10 years of construction will be unbearable, affecting the wellbeing of local people. • Rainfall will enter the proposed reservoir and not the local watercourses adversely affecting plant and wildlife. • Important agricultural land will be lost forever. • The microclimate will be affected resulting in more mist, fog and frost plus thousands of midges attracted by the muddy banks.

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		<ul style="list-style-type: none"> The health of local people will be adversely affected by the deterioration in air pollution, the increase in fog and the continual daytime noise during the years of construction.
	Our Response	<p><i>Flooding Risk of SESR</i></p> <p>A number of comprehensive flood risk studies regarding the SESR are available. A review of flooding and the provisions made to mitigate effects on flood risk due to the SESR has been undertaken, available in Thames Water’s Statement of Response No.2 Technical Appendix K. We have reviewed this and concur with the recommendations for further work, and also note that a Flood Risk Assessment for the SESR will be required to support the Development Consent Order (DCO).</p> <p><i>SEA and HRA</i></p> <p>We have addressed the points raised across the various representations which relate to the Strategic Environmental Assessment (“SEA”) and Habitat and Regulations Assessment (“HRA”) within the SoR appendices in further detail, as well as revising the fWRMP SEA/HRA documents where appropriate. We have included in the final SEA the second stage Egham to Iver transfer and the small trading option on the River Thames.</p> <p>We recognise there are many stakeholders with a keen interest in some of the strategic options proposed in our plan which are covered under the SEA process, and we would like to continue to, or start to, engage with the relevant parties and stakeholders to help add to our knowledge base for each of these.</p> <p><i>Environmental Effects and Mitigation</i></p> <p>In order to generate the SEA and HRA we engaged separate consultants to Thames Water, who reviewed the information provided about environmental impacts, mitigation and amenity potential for the SESR option as part of their analysis. Their analysis, as described within the SEA report, generally concurred with Thames Water, and outlines the construction mitigation required for the scheme in a way that is cross-compatible with our other options. The SEA confirmed the potential for amenity improvements as part of the scheme assessment, along with the need to design these improvements as part of the planning application process.</p> <p><i>Resilience to Drought of the SESR</i></p> <p>We have reviewed the technical reports relating to the drought and climate resilience of the SESR provided to us by Thames Water, which were peer reviewed through their technical stakeholder working groups, and consider that these clearly demonstrate that the SESR can provide the quoted yield reliably across a wide range of drought severities. We note that drought severity within those documents is as measured for the Thames Water supply system. We have therefore also carried out an initial review of the yield that we can expect from 50Mm³ of storage (one third of the reservoir capacity) under our drought design condition and confirmed that this should provide us with the expected 100Ml/d benefit. However, more detailed modelling, which will need to account for the ‘secondary benefit’ provided by increased effluent returns to Thames Water’s intakes (see response Error! Reference source not found.), plus the differences in timing and duration between our critical drought events and Thames Water’s critical drought events, is required before we can confirm the benefits from the scheme. This modelling is included within our AMP7 joint working investigations and is due to report before the crucial 2023 decision point.</p>
	Summary of any change to our final WRMP	N/A
1.22	Representation	<p>Risks</p> <ul style="list-style-type: none"> Risk of leakage

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		<ul style="list-style-type: none"> • Risk of flooding, as the area and village is mostly already zone 3, something that neither TW or Affinity has noted. • Risk of back-flood into the village. Construction of the reservoir would be across the Ock catchment area and in times of regular flood would cause backfill to East Hanney flooding the village. See the flood map that TW provided within its plan. • Risk of major catastrophe, because of the size and volume of water held behind the walls. • Risk of contamination to the environment and ground water during the construction period. • Risk that the development of a reservoir of the size and scale some 25 meters above ground level as proposed is unproven, and untried, it is nor known how sound it may be over time and if it can be successfully delivered. • Risk and loss of community and environment over the 8 year build period. • Risk and consequence of the impact that the tonnage of water will have on the underlying geology and aquifers, likely leading to underground flows and flooding in surrounding villages.
	Our Response	See response to 1.21 above.
	Summary of any change to our final WRMP	N/A
1.23 Representation		
1.23	Representation	<p>Parish Requirements</p> <ul style="list-style-type: none"> • A Public Enquiry must be instituted in order to establish the actual need for a reservoir at this location and on this scale. • Thames water with Affinity must be required to revisit and revise their respective Water Resource Management Plans in the light of the omissions and flaws that exist in their plan, • There must be more focus on fixing the leaks and consideration of actual need, • Affinity need to review whether there is a requirement for them to have water sourced from the proposed reservoir in view of the alternatives which they have and the issues, costs and risks that it would create. They should also review the start date based on a revised plan which addresses leaks and supply from other sources already available to them. • There must be consideration of whether a new reservoir is needed at all given changing demographics, and when, and where? There is no case for a mega reservoir, especially one with the risks, costs, and disturbance that TW/Affinity currently propose. • There needs to be a full and detailed independent analysis of the impact of the construction of a mega-reservoir of this type on the local area, which would necessarily include the effect on water courses and flooding, the loss of agricultural land, the effect of the weight of the water on local geology and micro-climate. • Changes in the population forecasts across the region and alignment to the needs of the people of the respective catchments must be the priority,

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		<ul style="list-style-type: none"> • Changes resulting from developments nationally and regionally as a result of Central and Local Government policy, including the as yet undefined impacts of 'Brexit', need to be factored in., • A full and detailed local consultation exercise in advance of the submission of any plans to develop the mega-reservoir, must be undertaken. • Areas of flood risk as identified in this area arising from the proposals must be addressed. • Thames water must retract statements that are incorrect, including that relating to risk of flooding, and their imagery to residents which to date has portrayed the proposed reservoir as similar to the facility at Farmoor in Oxfordshire, when in fact this proposal is for a considerably bigger reservoir, directly impacting on existing settlements and communities, with 25 high meter walls, 8 years of disturbance, and risk to the environment including risk of contamination. <p>Currently there are many basic omissions, and flaws in the plan which make it unsound. It must be referred to the secretary of state and to a public enquiry.</p>
	Our Response	<p>We acknowledge your view but believe that our fWRMP19 is robust, meets the requirements and guidance set out by our regulators, meets the long term needs of our supply area and is well supported by our customers.</p> <p>Going forward we are eager to work with you to address your concerns through involvement in our Monitoring Plan.</p> <p>The decision to progress to a public enquiry is one that will be made by the Secretary of State, Defra.</p>
	Summary of any change to our final WRMP	N/A
1.24	Representation	<p>Summary</p> <p>Southwest Oxfordshire and the Thames near Abingdon should not bear the brunt and cost to its environment and own supply, in order to support a unproven need from Affinity which can be better addressed through more conventional processes and arrangements that Affinity already have in place. There are many queries over the proposals made and Affinity's projections and argument for need is weak and unsound.</p> <p>Thames water's plan for a reservoir rests on perceived need from Affinity, but the need from Affinity is unproven and can be met by them locally. As highlighted by GARD there is no requirement for supply from a reservoir until 2060. That reservoir itself could be from within the local affinity area, helping deliver supply locally to meet local need.</p> <p>Neither Affinity's nor Thames Water's WRMP shows any detailed analysis of the effect of the proposals on immediate local areas, being simplistic and relating only to the region as a whole.</p> <p>Thames water appear to have dismissed numerous proposed sites with the specific intention of identifying the site to the south west of Abingdon as the only viable option. This outcome is based, as EHPC has demonstrated, on out-dated historic data and assumptions, with no substantiation of the effect of the mega-reservoir on the local environment.</p> <p>This site is also not convenient for Affinity and is outside of its catchment area.</p> <p>The Vale of White Horse District Council Local Plan 2031 (parts 1 & 2) have been required to identify land for such a project, though there is little detail, and the planned development of housing and local industry and employment does not fit clearly with the current plan from Thames Water/Affinity.</p>

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		<p>Immediate benefits, such a local employment are limited, the construction of such a project requiring specialist contractors the majority of whom would have to be imported from outside the region and indeed internationally.</p> <p>There has been no analysis of the effect of the construction of the mega-reservoir whilst the project is underway. Where would the workforce be located, how the associated plant and construction traffic would be accommodated on an already over-stretched local transport network and the resultant impact on the local economy have, for example not been addressed in any way.</p> <p>There is no clear or detailed statement about the consequences of the risk of contamination.</p> <p>East Hanney Parish Council fully expects both Affinity's and Thames Water's Water Resource Management Plans to be made subject to a Public Enquiry in its entirety, with particular emphasis on the identification of if there is the need for a mega-reservoir on such a scale, on whether the business case is flawed and would like to see amended projections provided which meet realistic and reduced growth demographics. Together with a review of the risks and issues associated with such a proposal, and on how supply could be met by alternative solutions.</p> <p>Also, what the impact would be on the local area and communities, and the costs to the local community and environment. Why the reservoir is proposed geographically so far from the area of the assumed future need. And why the reservoir is proposed at all when the volumes planned to be retained in this facility match the current issues with leakage across the Affinity and Thames Water regions as a whole jointly.</p>
	<p>Our Response</p>	<p>The decision to progress to a public enquiry is one that will be made by the Secretary of State, Defra.</p>
	<p>Summary of any change to our final WRMP</p>	<p>N/A</p>